

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
DAVENPORT DIVISION

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MAY 01 2013

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

3-11-cv-41-CW-TJS

vs.

SPECIAL VERDICT FORM

HILL COUNTRY FARMS, INC., d/b/a
HENRY'S TURKEY SERVICE,

Defendant.

We answer the Special Verdict Questions as follows:

QUESTION NO. 1. Did Hill Country Farms subject one or more of the claimants to disparate treatment as to the terms or conditions of their employment based on their intellectual disability? (See Instruction 10 for the elements of this claim.)

Answer "Yes" or "No."

ANSWER: yes

QUESTION NO. 2. Did Hill Country Farms subject one or more of the claimants to an unlawful hostile environment based on their intellectual disability? (See Instruction 11 for the elements of this claim.)

Answer "Yes" or "No."

ANSWER: yes

(If you answered "No" to both Question No. 1 and Question No. 2, do not answer any further questions.)

QUESTION NO. 3. What amount of damages, if any, is each claimant entitled to receive to compensate for the damages caused by the conduct of Hill Country Farms? Insert a dollar amount of compensatory damages or zero in the blank space provided for each claimant.

1. James Keith Brown \$ 5,500,000
2. Douglas Barco \$ 5,500,000
3. Leonard Barefield \$ 5,500,000
4. Clayton Gene Berg \$ 5,500,000
5. David Crouch \$ 5,500,000
6. Clarence Dunning \$ 5,500,000
7. James Fowler \$ 5,500,000
8. Pete Graffagnino \$ 5,500,000
9. Leon (L.C.) Hall \$ 5,500,000
10. John David Hatfield \$ 5,500,000
11. Paul Hayek \$ 5,500,000
12. Tommy House \$ 5,500,000
13. Kenneth Jackson \$ 5,500,000
14. Tommy Johnson \$ 5,500,000
15. Carl Wayne Jones \$ 5,500,000
16. Johnny Kent \$ 5,500,000

17. Ronald Lashley	\$ <u>5,500,000</u>
18. Willie Levi	\$ <u>5,500,000</u>
19. Jeffrey Long	\$ <u>5,500,000</u>
20. Johnny McDaniels	\$ <u>5,500,000</u>
21. Joe Morrell	\$ <u>5,500,000</u>
22. William (Bill) Murray	\$ <u>5,500,000</u>
23. Robert O'Bier	\$ <u>5,500,000</u>
24. John Owens (or Orange)	\$ <u>5,500,000</u>
25. Preston Pate	\$ <u>5,500,000</u>
26. Billy Penner	\$ <u>5,500,000</u>
27. Robert Penner	\$ <u>5,500,000</u>
28. Frank Rodriguez	\$ <u>5,500,000</u>
29. Doyle Trantham	\$ <u>5,500,000</u>
30. Raymond Vaughn	\$ <u>5,500,000</u>
31. Brady Watson	\$ <u>5,500,000</u>
32. Henry Dewey Wilkens	\$ <u>5,500,000</u>

QUESTION NO. 4. Did Hill Country Farms act with malice or with reckless indifference to the federally protected rights of its former employees? (See Instruction 13.A)

Answer "Yes" or "No."

ANSWER: yes

(If you answered "No" to Question No. 4, do not answer any further questions.)

QUESTION NO. 5. To what amount of punitive damages, if any, is the EEOC on behalf of one or more of the claimants entitled? Insert a dollar amount of punitive damages or zero for each claimant.

- | | | |
|-----|---------------------|---------------------|
| 1. | James Keith Brown | \$ <u>2,000,000</u> |
| 2. | Douglas Barco | \$ <u>2,000,000</u> |
| 3. | Leonard Barefield | \$ <u>2,000,000</u> |
| 4. | Clayton Gene Berg | \$ <u>2,000,000</u> |
| 5. | David Crouch | \$ <u>2,000,000</u> |
| 6. | Clarence Dunning | \$ <u>2,000,000</u> |
| 7. | James Fowler | \$ <u>2,000,000</u> |
| 8. | Pete Graffagnino | \$ <u>2,000,000</u> |
| 9. | Leon (L.C.) Hall | \$ <u>2,000,000</u> |
| 10. | John David Hatfield | \$ <u>2,000,000</u> |
| 11. | Paul Hayek | \$ <u>2,000,000</u> |

12.	Tommy House	\$ <u>2,000,000</u>
13.	Kenneth Jackson	\$ <u>2,000,000</u>
14.	Tommy Johnson	\$ <u>2,000,000</u>
15.	Carl Wayne Jones	\$ <u>2,000,000</u>
16.	Johnny Kent	\$ <u>2,000,000</u>
17.	Ronald Lashley	\$ <u>2,000,000</u>
18.	Willie Levi	\$ <u>2,000,000</u>
19.	Jeffrey Long	\$ <u>2,000,000</u>
20.	Johnny McDaniels	\$ <u>2,000,000</u>
21.	Joe Morrell	\$ <u>2,000,000</u>
22.	William (Bill) Murray	\$ <u>2,000,000</u>
23.	Robert O'Bier	\$ <u>2,000,000</u>
24.	John Owens (or Orange)	\$ <u>2,000,000</u>
25.	Preston Pate	\$ <u>2,000,000</u>
26.	Billy Penner	\$ <u>2,000,000</u>
27.	Robert Penner	\$ <u>2,000,000</u>
28.	Frank Rodriguez	\$ <u>2,000,000</u>
29.	Doyle Trantham	\$ <u>2,000,000</u>
30.	Raymond Vaughn	\$ <u>2,000,000</u>

31. Brady Watson \$ 2,000,000
32. Henry Dewey Wilkens \$ 2,000,000

~~FOREPERSON~~ _____